

1 BARRY J. PORTMAN  
Federal Public Defender  
2 JEROME E. MATTHEWS  
Assistant Federal Public Defender  
3 555 - 12th Street  
Suite 650  
4 Oakland, CA 94607-3627  
Telephone: (510) 637-3500  
5  
Counsel for Defendant MICHAEL DOWNEY  
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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,	)	No. CR-05 00651 CW [WDB]
	)	
12 Plaintiff,	)	STIPULATION AND <del>PROPOSED</del>
	)	ORDER MODIFYING RELEASE
13 vs.	)	CONDITIONS
	)	
14 MICHAEL DOWNEY, et al.,	)	
	)	
15	)	
Defendants.	)	

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17  
18 Michael Downey recently learned that his mother died. By prior stipulation and order of  
19 this Court, Mr. Downey was permitted to leave the New Bridge facility to spend time with his  
20 mother and family during this critical period. He did so, and returned to New Bridge without  
21 incident.

22 Mr. Downey's father, who has suffered a stroke, is not physically capable of managing  
23 family matters by himself. Mr. Downey therefore requests that he be permitted to leave New  
24 Bridge. Mr. Downey has been enrolled at New Bridge since the date of his release from custody,  
25 has participated fully in its programs, and has otherwise complied with all conditions of his  
26 release. Mr. Downey nonetheless wishes to avail himself of New Bridge's aftercare services on a

1 weekly basis. New Bridge staff concurs that Mr. Downey's progress supports his request.

2 It is therefore STIPULATED AND AGREED that Mr. Downey may leave New Bridge,  
3 and establish residence in Antioch, California, subject to continued supervision by U.S. Pretrial  
4 Services.

5 /S/  
6 Dated: June 21, 2006

KIRSTIN AULT  
Assistant United States Attorney

8 /S/  
9 Dated: June 20, 2006

JEROME E. MATTHEWS  
Assistant Federal Public Defender

11 /S/  
12 Dated: June 21, 2006

VICTORIA GIBSON  
U.S. Pretrial Services Officer

14 I hereby attest that I have on file all holograph signatures for any signatures indicated by a  
15 "conformed" signature (/S/) within this e-filed document.

17 Good cause appearing therefor, IT IS ORDERED that Michael Downey may leave New  
18 Bridge as provided in the foregoing stipulation. Mr. Downey shall continue to be subject to  
19 supervision by Pretrial Services, and shall abide by such conditions as Pretrial Services deems  
20 appropriate.

22 Dated: June 26, 2006

